

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
Revision of Part 22 and Part 90 of the)	WT Docket No. 96-18
Commission's Rules to Facilitate Future)	
Development of Paging Systems)	
)	
Implementation of Section 309(j))	PP Docket No. 93-253
of the Communications Act --)	
Competitive Bidding)	
To: The Commission		DOCKET FILE COPY ORIGINAL

PETITION FOR PARTIAL RECONSIDERATION

The law firm of Blooston, Mordkofsky, Jackson & Dickens, on behalf of its paging clients¹ and pursuant to Section 1.429 of the Commission's Rules, hereby requests partial reconsideration of the interim licensing rules adopted in the Commission's First Report and Order ("the Order") in the above-captioned proceeding.² The Commission should be applauded for establishing interim licensing rules which permit incumbent carriers to file expansion applications. However, the interim filing rights should be modified in order to (1) allow expansion from recently granted sites, (2) allow 75-mile expansions in sparsely populated areas, and (3) prevent unwarranted competing applica-

¹ The paging clients of Blooston, Mordkofsky, Jackson & Dickens have participated in earlier phases of this proceeding, under the names "the Paging Coalition" (for common carrier and exclusive private carrier paging licensees) and "the Paging Licensees" (for shared frequency paging carriers). However, the issues raised herein are for the most part common to all of the paging carriers represented by the firm.

² WT Docket No. 96-18 and PP Docket No. 93-253, 61 Fed. Reg. 21380 (May 10, 1996).

tions. Otherwise, the purpose of the rule changes will be seriously undermined.

I. Expansion Rights Should Be Extended To All Granted Pre-Freeze Applications.

The Commission's Order, which permits incumbent licensees to file expansion applications, is a step in the right direction. However, the Commission has limited the right of incumbent licensees to file such expansion applications to those sites within a 40-mile radius of co-channel stations which were licensed to the applicant as of February 8, 1996. This limitation unduly discriminates against incumbent licensees whose applications were pending as of February 8, 1996 (many for over a year) but have since been granted. It is respectfully submitted that incumbent licensees should be permitted to file expansion applications within 40 miles of any site which is ultimately authorized in response to an application filed prior to the effective date of the paging freeze (February 8, 1996). This should be the case even if the pending application is granted after market area licensing rules are adopted.

Applications filed by incumbent licensees prior to the freeze were bona fide facility proposals and were obviously not submitted to "game" the system. It is therefore illogical to limit expansion rights to applications granted before the freeze. The harmful impact of the Commission's approach is best demonstrated in the 931 MHz band. Scores of 931 MHz paging applications have been pending for well over a year. It has only been since the Commission's May 15, 1996 Public Notice (Report No. NCS-96-28-A), well after the freeze was imposed, that any appreciable number of 931 MHz

applications have been processed to grant. The processing delays associated with the 931 MHz paging applications have been beyond the control of the individual applicants, and have been exacerbated by the Commission's recent conversion to a new computer license database, and implementation of new application processing software for 931 MHz filings.

Thus, if two paging competitors (one operating in the VHF band, the other operating in the 931 MHz band) both submitted applications on May 1, 1995, it is likely that the VHF application would have been granted well ahead of February 8, 1996, while the 931 MHz application would still be pending. By mere happenstance of processing delays, two competitors who were equally diligent would suffer drastically different fates: The VHF licensee would be restricted by the freeze from filing applications for entirely new areas, but would at least be able to expand 40 miles in every direction from its existing sites, thereby substantially improving its coverage. The 931 MHz competitor, unable to expand at all, would thereby find that it is unable to effectively compete in the marketplace despite its diligence and investment in the paging system.

Incumbent paging licensees should not be penalized for Commission delays in the processing of their applications that resulted through no fault of their own. To do so deprives their public subscribers of urgently needed service improvements and unfairly discriminates among competing carriers. The expansions and modifications proposed in those applications which were still pending as of February 8, 1996, reflect 1995 (and before) demands for expanded service. Paging carriers must now be able to meet current and

future customer demands by filing for sites which are within 40 miles of pre-freeze applications. Therefore, it is urgent that the Commission allow incumbent licensees to file expansion applications for new sites that are within a 40-mile radius of any site which was granted pursuant to an application filed prior to February 8, 1996. This would not frustrate or be otherwise inconsistent with the Commission's rationale in partially lifting the freeze.

II. The Permitted Expansion Area Should Be Increased To 75 Miles In Sparsely Populated Areas.

In urban and suburban situations, the 40-mile expansion distance chosen by the Commission may serve as a reasonable accommodation to incumbent licensees. However, in less populated areas of the country, such as the Plains States, the Rocky Mountain region, and the Southwest (and especially in rural areas), this 40-mile limitation is far too restrictive. Often, the next town of any appreciable size (and therefore the natural area of service expansion) is more than 40 miles away.

Senator Larry Pressler, Chairman of the Senate Committee on Commerce, Science and Transportation, recognized this dilemma in his May 1, 1996 statement on the floor of the Senate (142 Cong. Rec. S4514, copy attached). In that statement, Senator Pressler urged the Commission to adopt a 75-mile expansion zone. Seventy-five miles would be a far more appropriate measure for expansion rights, in sparsely populated areas -- a good example of which is Senator Pressler's home state of South Dakota. The Commission should therefore adopt Senator Pressler's suggestion.

III. Competing Applications Should Be Restricted To Incumbent Co-channel Licensees.

In light of the Commission's recent concerns about consumer fraud and paging application speculation, it is disturbing that the Commission has decided to allow any person or entity to file a competing application against incumbent expansion proposals, even if the competing applicant has no current claim to the frequency. See Order, at para. 26. Unfortunately, this procedure only invites speculators and competitors to file on top of bona fide expansion applications, and creates new opportunities for consumer fraud.

The Commission should allow competing applications to be filed only by other incumbent licensees that have co-channel facilities within 75 miles or less of the proposed expansion site triggering the filing window. This eligibility restriction would help to ensure that only legitimate proposals are submitted during the expansion process. Indeed, the purpose of the filing rights created by the Order is to allow existing licensees to extend their coverage in response to customer needs. There is no justification for giving third parties free reign to file on top of these expansion proposals. On the other hand, co-channel licensees with contiguous service areas should be allowed to vie for expansion rights in those areas where their systems meet.

The same statutory authority which allowed the Commission to restrict interim applications to incumbent expansion filings allows the Commission to restrict the class of potential competing applicants. See Order, at para. 27; U.S. v. Storer Broadcasting, 351 U.S. 192 (1956) (Commission can establish eligibility standards if supported by the record). The record in this proceeding

clearly demonstrates that incumbent licensees should be given a reasonable opportunity to respond to marketplace demands for expanded coverage. Order at para. 9. Non-incumbents will have an opportunity to compete for paging spectrum by participating in the auctions (if market area licensing is adopted).

As Senator Pressler stated:

Another problem is created by the FCC's proposal to allow anyone to file a competing application against the expansion proposals of existing carriers. The FCC has defended the freeze as a mechanism to prevent filing by speculators and application mills, many of which use the application process to defraud consumers out of their life savings. This is a worthy goal. However, the new rule contains an ironic twist. If anyone can file a competing application against an existing paging carrier's expansion, speculation and fraudulent filings will be encouraged. The application mills that currently are not able to file applications will now target each and every expansion proposal, because it will be their only opportunity to practice their unholy trade. This will allow continued consumer fraud. It also will prevent bona fide paging companies from expanding their coverage, since any expansion proposal which is filed against will be held in abeyance and probably dismissed. This result would nullify the good work of the FCC in modifying the freeze. I strongly suspect it is an unintended result.

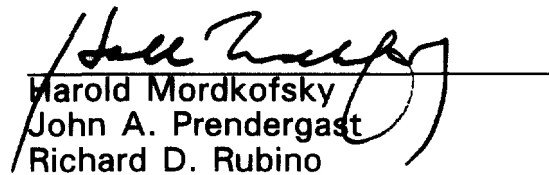
142 Cong. Rec. S4514, May 1, 1996.

Accordingly, the Commission should prevent this unintended result, by basing expansion rights on when a site was proposed, not when it was authorized.

CONCLUSION

In light of the foregoing, it is respectfully requested that the Commission modify its interim paging licensing rules in the manner described above.

Respectfully submitted,


Harold Mordkofsky
John A. Prendergast
Richard D. Rubino

BLOOSTON, MORDKOFKY, JACKSON
& DICKENS
2120 L Street, N.W., Suite 300
Washington, D.C. 20037
(202) 659-0830

Filed: June 6, 1996

response of providing \$30 million in logistical assistance to the West African Peacekeeping force, ECOMOG. Such assistance is necessary to keep ECOMOG actively engaged in the on-the-ground peace process.

Mr. President, I call upon the various warlords to respect the cease-fire and to pursue a peaceful solution. In addition, it is important to remind the warlords that an attempt by any faction to seize power by force or to undo the Abuja Accords will receive a strong American response.

While the ultimate resolution of the crisis remains the responsibility of the Liberians, the United States has an important role to play. The United States is the most influential foreign power in Liberia. The United States must remain committed to seeking peace in Liberia. An engaged United States can help a Liberia that wants peace.

FCC'S PAGING FREEZE

Mr. PRESSLER. Mr. President, on February 8, 1996, the Federal Communications Commission issued a notice of proposed rulemaking which proposed to fundamentally change the way in which paging systems are licensed. The FCC adopted a freeze on the filing of paging applications, which immediately brought about many harmful effects. I promptly expressed my concerns to the FCC about its actions and asked Chairman Hundt to do something about the freeze in a letter dated March, 15, 1996.

I am glad to say that on April 23, 1996, the FCC issued an order demonstrating it had listened to my concerns and the concerns of the industry with regard to the paging freeze. The FCC has modified the freeze so that existing paging carriers can apply to expand their systems by putting transmitters within 40 miles of stations they already are operating, so long as these stations were licensed before the freeze. The FCC also has decided against retroactively applying the freeze and will now process all applications which were filed before the February 8 freeze date.

These are two very important steps towards mitigating the harmful impact of the freeze, and I wish to congratulate the FCC on its response. However, it has come to my attention there are some significant shortcomings in the mechanics of the new rules. With minor clarifications, the FCC could eliminate these shortcomings.

In particular, the industry believes—and several Members of Congress agree—75 miles would be a more appropriate zone of expansion as opposed to 40 miles. The increased distance would allow existing paging businesses to accommodate their customers' immediate needs and respond to new requests for paging service as factories, hospitals, and neighborhoods are constructed and the need for paging coverage expands.

Paging companies should be allowed to apply for new transmitters within 75

miles of any transmitter which has been licensed or which will be licensed based on an application filed before the freeze. The point is, many expansion proposals were filed by paging companies more than 1 year ago, and have been delayed at the FCC. These applications reflect expansions that were needed months ago. Indeed, these carriers now are receiving requests for further expansions. If we limit paging companies to a zone 40 miles from transmitters already licensed and operating, the only expansion they may be able to achieve would be adding those locations for which they applied last year. Additional coverage needs in the coming months will go unmet.

Another problem is created by the FCC's proposal to allow anyone to file a competing application against the expansion proposals of existing carriers. The FCC has defended the freeze as a mechanism to prevent filing by speculators and application mills, many of which use the application process to defraud consumers out of their life savings. This is a worthy goal. However, the new rule contains an ironic twist. If anyone can file a competing application against an existing paging carrier's expansion, speculation and fraudulent filings will be encouraged. The application mills that currently are not able to file applications will now target each and every expansion proposal, because it will be their only opportunity to practice their unhelpful trade. This will allow continued consumer fraud. It also will prevent bona fide paging companies from expanding their coverage, since any expansion proposal which is filed against will be held in abeyance and probably dismissed. This result would nullify the good work of the FCC in modifying the freeze. I strongly suspect it is an unintended result.

To prevent this anomalous result, the FCC can make minor adjustments to its freeze modification order: First, allowing a 75-mile expansion zone; second, allowing the expansion sites to be established, within 75 miles of any transmitter granted from an application filed before the freeze; and third, limiting competing applicants to other carriers.

It is vital the FCC take steps to mitigate the harmful effects of the freeze. The paging industry provides service to over 34 million subscribers. Industry members have been encouraged to make considerable investments to improve their services, and have relied in good faith on the FCC's published regulations. Paging services are designed to serve the needs of increasingly mobile customers. To be competitive, these businesses need to provide their service to the customers where and when they need it. If a paging service cannot respond to the needs of its existing and potential customers, it will not survive in this extremely competitive industry.

This competition has spurred technological advances in what can be communicated over a pager. No longer is a

pager some simple little box that beeps to let you know you should call your office. Today's pagers are vehicles for communicating written messages. For example, news organizations like Reuters now offer periodic summaries of breaking news stories through pagers. Pagers also provide cost-efficient means of communicating within large factory complexes. Additionally, we must not forget the lifesaving contribution these services make when used by doctors, ambulance crews, and critically ill patients, to summon assistance in the event of an emergency.

The bottom line, Mr. President, is that this technology must be allowed to grow. That was the basis for my letter in March. At the same time, the process must not be so full of loopholes as to allow the unscrupulous to benefit at the expense of consumers. That is the challenge faced by the FCC. It has begun meeting the challenge by modifying its freeze on the filing of paging applicants. The flaws in its initial proposal should prove easy to address. As chairman of the Senate Committee on Commerce, Science, and Transportation, I stand ready to help this process in any reasonable manner.

THE VERY BAD DEBT BOXSCORE

Mr. HELMS. Mr. President, 4 years ago when I commenced these daily reports to the Senate it was my purpose to make a matter of daily record the exact Federal debt as of the close of business the previous day.

In that first report, February 27, 1992, the Federal debt the previous day stood at \$3,825,891,293,066.80, as of the close of business. The point is, the Federal debt has since shot further into the stratosphere.

As of yesterday at the close of business, a total of \$1,276,157,534,167.42 has been added to the Federal debt since February 26, 1992, meaning that as of the close of business yesterday, Tuesday, April 30, 1996, the Federal debt stood at \$5,102,048,827,234.22. On a per capita basis, every man, woman, and child in America owes \$19,271.23 as his or her share of the Federal debt.

TRIBUTE TO VICE ADMIRAL JOHN BULKELEY

Mr. WARNER. Mr. President, I rise today to recognize the dedication, public service and patriotism that personified the life of Vice Admiral John Duncan Bulkeley, USN. Admiral Bulkeley, who passed away on April 6, was one of the most highly decorated combat veterans of World War II and served nearly 60 years of active duty during his career.

A native of New York City, Admiral Bulkeley entered the U.S. Navy after graduating from the Naval Academy at Annapolis, and was commissioned in March of 1934. He began his Navy career as a junior watch officer aboard the cruiser *Indianapolis*. He then spent time on the carrier *Saratoga* and as an

CERTIFICATE OF SERVICE

I, Richard D. Rubino, hereby certify that I am an employee of Blooston, Mordkofsky, Jackson & Dickens, and that on this 6th day of June 1996, I caused to be delivered by first-class U.S. mail, postage prepaid, a copy of the foregoing **Petition for Partial Reconsideration** to the following:

Chairman Reed Hundt *
Federal Communications Commission
1919 M Street, NW, Room 814
Washington, DC 20554

ITS *
Room 246
1919 M Street, NW
Washington, DC 20554

Commissioner James Quello *
Federal Communications Commission
1919 M Street, NW, Room 802
Washington, DC 20554

A. Thomas Carroccia, Esq.
Bell, Boyd & Lloyd
1615 L Street, N.W., Suite 1200
Washington, D.C. 20036
For: A+ Communications, Inc.

Commissioner Andrew Barrett *
Federal Communications Commission
1919 M Street, NW, Room 826
Washington, DC 20554

John L. Crump
d/b/a ACE Communications
11403 Waples Mill Road
P.O. Box 3070
Oakton, VA 22124

Commissioner Rachelle Chong *
Federal Communications Commission
1919 M Street, NW, Room 844
Washington, DC 20554

George V. Wheeler, Esq.
Koteen & Naftalin
1150 Connecticut Avenue, N.W.
Washington, D.C. 20036
For: American Paging, Inc.

Commissioner Susan Ness *
Federal Communications Commission
1919 M Street, NW, Room 832
Washington, DC 20554

Donald J. Evans, Esq.
McFadden, Evans & Sill
1627 Eye Street, N.W., Suite 810
Washington, D.C. 20006
For: B & B Communications, Inc.

Michelle Farquhar, Chief *
Wireless Telecommunications Bureau
Federal Communications Commission
2025 M Street, NW, Room 5002
Washington, D.C. 20554

Jill Abeshouse Stern, Esq.
Robert J. Cynkar, Esq.
Janice H. Ziegler, Esq.
Edmund D. Daniels, Esq.
Shaw, Pittman, Potts & Trowbridge
2300 N Street, N.W.
Washington, D.C. 20037
For: Coalition for a Competitive
Paging Industry

David Furth, Chief *
Commercial Wireless Division
Wireless Telecommunications Bureau
Federal Communications Commission
2025 M Street, NW, Room 7002
Washington, D.C. 20554

Veronica M. Ahern, Esq.
Nixon, Hargrave, Devans & Doyle
One Thomas Circle
Washington, D.C. 20005
For: Consolidated Communications
Mobile Services, Inc.

Mika Savir, Esq. - Legal Branch *
Commercial Wireless Division
Wireless Telecommunications Bureau
Federal Communications Commission
2025 M Street, NW, Room 7130
Washington, D.C. 20554

* By Hand Delivery

Michael J. Shortley, III, Esq.
Frontier Corporation
180 South Clinton Avenue
Rochester, NY 14646

Joseph Konopny, Esq.
William L. Fishman, Esq.
Sullivan & Worcester, LLP
1025 Connecticut Avenue, N.W.
Suite 1000
Washington, D.C. 20036
For: Diamond Page Partnerships
AmericaOne
Northwest Pager
Metro Paging
West Virginia Pager
PagerOne

Alan S. Tilles, Esq.
Meyer, Faller, Weisman & Rosenberg
440 Jenifer Street, N.W., Suite 380
Washington, D.C. 20015
For: Glenayre Technologies, Inc.

Gene P. Belardi, Vice President
MobileMedia Communications, Inc.
2101 Wilson Boulevard, Suite 935
Arlington, VA 22201

Thomas Gutierrez, Esq.
J. Justin McClure, Esq.
Lukas, McGowan, Nace & Gutierrez
1111 19th Street, N.W., Suite 1200
Washington, D.C. 20036
For: Mobile Telecommunication
Technologies Corporation

William J. Franklin, Esq.
William J. Franklin, Chartered
1200 G Street, N.W., Suite 800
Washington, D.C. 20005-3814
For: North State Communications Inc.
Rule Radiophone Service, Inc.
Rule Communications

Robert R. Rule
Rule Communications, Inc.
2232 Dell Range Boulevard
Cheyenne, WY 82009

Lucille M. Mates, Esq.
Pacific Bell
140 New Montgomery St., Rm 1526
San Francisco, CA 94105

James L. Wurtz, Esq.
Margaret E. Garber, Esq.
Pacific Telesis
1275 Pennsylvania Avenue, N.W.
Washington, D.C. 20004
For: Pacific Bell

Judith St. Ledger-Roty, Esq.
Paul G. Madison, Esq.
Reed, Smith, Shaw & McClay
1301 K Street, N.W.
Suite 1100 - East Tower
Washington, D.C. 20005
For: Paging Network, Inc.

Phillip L. Spector, Esq.
Thomas A. Boasberg, Esq.
Paul, Weiss, Rifkind, Wharton
& Garrison
1615 L Street, N.W.
Washington, D.C. 20036
For: Pagemart, Inc.

John D. Pellegrin, Esq.
John D. Pellegrin, Chartered
1140 Connecticut Avenue, N.W.
Suite 606
Washington, D.C. 20036

Katherine M. Holden, Esq.
Wiley Rein & Fielding
1776 K Street, N.W.
Washington, D.C. 20006
For: Personal Communications
Industry Association

Mark J. Golden
Vice President of Industry Affairs
Personal Communications Industry Assn
1019 19th Street, N.W., Suite 1100
Washington, D.C. 20036

George L. Lyon, Jr., Esq.
 Pamela Gaary, Esq.
 Lukas, McGowan, Nace & Gutierrez
 1111 19th Street, N.W., Suite 1200
 Washington, D.C. 20036
 For: Jon D. Word
 Pioneer Telephone Cooperative

Terry J. Romine, Esq.
 Lukas, McGowan, Nace & Gutierrez
 1111 19th Street, N.W., Suite 1200
 Washington, D.C. 20036
 For: Preferred Networks, Inc.

Ellen S. Mandell, Esq.
 Pepper & Corazzini, LLP
 1776 K Street, N.W., Suite 200
 Washington, D.C. 20006
 For: Pagers Plus
 Priority Communications, Inc.

Jerome K. Blask, Esq.
 Daniel E. Smith, Esq.
 Gurman, Blask & Freedman, Chartered
 1400 Sixteenth Street, N.W.
 Suite 500
 Washington, D.C. 20036
 For: ProNet Inc.

Robert H. Schwaninger, Jr., Esq.
 Brown and Schwaninger
 1835 K Street, N.W., Suite 650
 Washington, D.C. 20006

David L. Hill, Esq.
 Audrey P. Rasmussen, Esq.
 O'Connor & Hannan
 1919 Pennsylvania Avenue, N.W.
 Suite 800
 Washington, D.C. 20006-3483
 For: Paging Partners Corporation
 Source One Wireless, Inc.

Richard S. Becker, Esq.
 James S. Finerfrock, Esq.
 Jeffrey E. Rummel, Esq.
 Richard S. Becker & Assoc., Chartered
 1915 Eye Street, N.W., 8th Floor
 Washington, D.C. 20006
 For: TSR Paging Inc.

Raymond C. Trott, P.E.
 Trott Communications Group, Inc.
 1425 Greenway Drive, Suite 350
 Irving, TX 75038

Steven S. Seltzer, President
 Personal Communications, Inc.
 RCC of Pennsylvania, Inc.
 Modern Communications Corp.
 P.O. Box One
 Altoona, PA 16603-0001

Amelia L. Brown, Esq.
 Henry A. Solomon, Esq.
 Haley, Bader & Potts
 4350 N. Fairfax Drive, Suite 900
 Arlington, VA 22203-1633
 For: Personal Communications, Inc.
 RCC of Pennsylvania, Inc.
 Modern Communications Corp.
 Western Radio Services Co., Inc.

Frederick M. Joyce, Esq.
 Christine McLaughlin, Esq.
 Joyce & Jacobs, LLP
 1019 19th Street, N.W.
 14th Floor, PH-2
 Washington, D.C. 20036
 For: A+ Network
 Brandon Communications
 Merryville Investments
 Metrocall, Inc.
 Morris Communications, Inc.
 Nationwide Paging, Inc.
 Page-USA, Inc.
 Pager One

George L. Lyon, Jr., Esq.
 David Nace, Esq.
 Lukas, McGowan, Nace & Gutierrez
 1111 19th Street, N.W., Suite 1200
 Washington, D.C. 20036
 For: Page Telecommunications, LLC
 Heartland Telecommunications

Alan R. Shark, President
 American Mobile Telecommuni-
 cations Association
 1150 18th Street, N.W., Suite 250
 Washington, D.C. 20036

Rick Hafla
Teton Communications, Inc.
545 South Utah Avenue
Idaho Falls, ID 83402

Pamela L. Gist, Esq.
Lukas, McGowan, Nace & Gutierrez
1111 19th Street, N.W., Suite 1200
Washington, D.C. 20036
Counsel for: Liberty Cellular, Inc.

Charles D. Cosson, Esq.
Mary McDermott, Esq.
Linda Kent, Esq.
U.S. Telephone Association
1401 H Street, N.W., Suite 600
Washington, D.C. 20005

William Ciuffo
Comp Comm, Inc.
One Echelon Plaza, Suite 100
227 Laurel Road
Voorhees, NJ 08043-2331

Lloyd D. Huffman
Huffman Communications
2829 West 7th Avenue
P. O. Box 1753
Corsicana, TX 75151-1753

Caressa D. Bennet, Esq.
Michael R. Bennet, Esq.
Bennet & Bennet, PLLC
1831 Ontario Place, N.W., Suite 200
Washington, D.C. 20009
For: Border to Border Communications

Larry Shaefer, President
SMR Systems, Inc.
4212 Mt. Vernon
Houston, TX 77006-5416

Dallas Vanderhoof
General Manager
TeleBEEPER of New Mexico, Inc.
P.O. Box 25161
Albuquerque, NM 87125

Laura H. Phillips, Esq.
Christina H. Burrow, Esq.
Dow, Lohnes & Albertson
1200 New Hampshire Avenue, NW
Suite 800
Washington, D.C. 20036-6802
For: Sunbelt Transmission Corp.
Snider Communications Corp.

Lawrence M. Miller, Esq.
Schwartz, Woods & Miller
1320 Connecticut Avenue, NW
Suite 300
Washington, D.C. 20036
For: Datafon II, Inc.
Zipcall Long Distance, Inc.

James F. Roberts, Esq.
Marsha Y. Reeves, Esq.
Latham & Watkins
1001 Pennsylvania Avenue, NW
Suite 300
Washington, D.C. 20004-2505
For: PageAmerica Group, Inc.

Donald A. Fishman, Esq.
Kevin C. Boyle, Esq.
Latham & Watkins
1001 Pennsylvania Avenue, NW
Suite 300
Washington, D.C. 20004-2505
For: MobileMedia Communications, Inc.

David C. Jatlow, Esq.
Young & Jatlow
2300 N Street, NW, Suite 600
Washington, D.C. 20037
For: AT&T Wireless

Dennis L. Myers, Vice President
Ameritech Cellular Services
2000 West Ameritech Center Drive
Location 3H78
Hoffman Estates, IL 60195-5000

Jay Kitchen, President
PCIA
500 Montgomery Street, Suite 700
Alexandria, VA 22314

Heather Hipsley, Esq.
 Bureau of Consumer Protection
 Federal Trade Commission
 6th and Pennsylvania Avenues, N.W.
 Room 282-B
 Washington, D.C. 20580

Jeanne M. Walsh, Esq.
 Kurtis & Associates, P.C.
 2000 M Street, NW, Suite 600
 Washington, D.C. 20036

Jack Richards, Esq.
 Keller and Heckman
 1001 G Street, NW, Suite 500 West
 Washington, D.C. 20001

Kevin O'Brien, President
 O'Brien Communications
 5054 Rapidan Place
 Annandale, VA 22003

Carl W. Northrop, Esq.
 Paul, Hastings, Janofsky & Walker
 1299 Penn. Ave, NW, 10th Floor
 Washington, D.C. 20004
 For: AACS Communications, Inc.
 AirTouch Paging
 Answer, Inc.
 Arch Communications Group Inc.
 Cal-Autofone
 Centrapage of Vermont
 Centracom, Inc.
 Communications Enterprises
 Desert Mobilfone
 Detroit Newspaper Agency
 Electronic Engineering Company
 Hello Pager Company, Inc.
 Jackson Mobilphone Company
 LaVergne's Telephone Ans. Serv.
 Midco Communications
 Donald G. Pollard d/b/a Siskiyau
 Mobilfone
 PowerPage, Inc.
 Radio Electronic Products Corp.
 RETCOM, Inc.
 Westlink Licensee Corporation

Timothy E. Welch, Esq.
 Hill & Welch
 1330 New Hampshire Avenue, N.W.
 Suite 113
 Washington, D.C. 20036
 For: Amery Telephone Company, Inc.
 ATS Mobile Telephone, Inc.
 B & B Beepers
 Baker's Elec. & Communications
 Baldwin Telecom, Inc.
 Benkelman Telephone Company
 Chequamegon Telephone Co-op
 Communications Sales & Service
 HEI Communications, Inc.
 Mashell Connect, Inc.
 Metamora Telephone Company
 Mobilfone Service, Inc.
 Paging Associates, Inc.
 Pigeon Telephone Company, Inc.
 Porter Communications, Inc.
 Karl A. Rinker d/b/a Rinkers
 Communications
 Supercom, Inc.
 Wauneta Telephone Company
 Wilkinson County Telephone
 Company, Inc.

